

Tammy\_Ash@fws.gov 05/13/2005 11:22 AM

To: Rafael Casanova/R6/USEPA/US@EPA

cc: don.pitts@tpwd.state.tx.us, rseiler@tceq.state.tx.us, keith.tischler@glo.state.tx.us, Jessica.White@noaa.gov, Barry Forsythe/R6/USEPA/US@EPA

Subject: Falcon revised document

## Rafael,

I am halfway through the Falcon revised document. They state repeatedly throughout the document that "the wetland areas located south, southeast and east of the facility and the pipelines leading from the North Site to the docking facility will be evaluated in the future, after the issues concerning the ARM Refining pipeline spill in the wetlands are resolved." As both you and the trustees have stated to NORCO repeatedly, this is unacceptable. This combined with other flaws in the document make me doubt that I should continue reviewing the document in depth. I cannot see how they can continue with the RI and the associated ecological risk assessment without sampling in the wetlands prior to drafting the documents and the document clearly states they have no intention of sampling until after the ARM spill is resolved. Your advice/comments?

Tammy